

# Exhibit 2

NEW YORK STATE  
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF  
HUMAN RIGHTS on the Complaint of

NOREEN SHEA,

Complainant,

v.

VILLAGE OF POMONA,

Respondent.

VERIFIED COMPLAINT  
Pursuant to Executive Law,  
Article 15

Case No.  
**10190879**

Federal Charge No. 16GB800346

I, Noreen Shea, residing at 4 Chimney Corner Road, New Windsor, NY, 12553, charge the above named respondent, whose address is 100 Ladentown Road, Pomona, NY, 10970 with an unlawful discriminatory practice relating to employment in violation of Article 15 of the Executive Law of the State of New York (Human Rights Law) because of creed.

Date most recent or continuing discrimination took place is 6/23/2017.

The allegations are:

1. I am Non-Jewish. Because of this, I have been subject to unlawful discriminatory actions.
2. I began working for the above-named Respondent as Deputy Village Clerk, on February 1, 2016. To my knowledge, I performed my job in a satisfactory manner.
3. Upon information and belief, I was wrongfully terminated from my employment, on June 23, 2017 by Brett Yagel, the Mayor, who said he did not have to give me a reason. I was informed by Respondent's Building Inspector months prior however, that the Mayor calls me the "Jew Lover".
4. Upon information and belief, a large number of residents that live in the Village of Pomona are adherents of the Orthodox Jewish religion. I help them just the same as I would any person that enters the office for permits, surveys, and information on the Village. I can, by law, make them wait for their Freedom of Information Law (FOIL) request, surveys, and other documents, etc., but instead I try to serve the public in the most efficient and expeditious manner possible, which seemingly has cost me my employment with the Village.
5. Upon information and belief, on many occasions, I have been confronted by the Mayor and Frances Arsa-Artha, the Village Clerk/Treasurer, and told to stop being too cooperative with certain Jewish residents of the village. Specifically, one day, a well-known Orthodox Jewish

investor and builder in the village stopped in with his little daughter, who happened to be a redhead like myself. This builder was seeking information about one of his properties. A few days later, the Mayor gave me a lecture that centered around how I should handle any request from certain types of people. He then told me to stop saying how cute people's kids are and to have very little conversation with "those types."

6. Upon information and belief, although the Mayor was not present when I said to the well-known Orthodox Jewish investor and builder that his daughter was cute, evidently, Respondent's Village Clerk/Treasurer informed the Mayor of my nice, friendly conversation with him.

7. Upon information and belief, this well-known Orthodox Jewish investor and builder is like other Orthodox Jewish residents, investors, and/or builders who are delayed in receiving permits until the very last day of a thirty (30) day processing period that is allowed by law, and this directive to delay until the last day of that period, is as per Respondent's Mayor.

8. Upon information and belief, Respondent's Mayor advised me to "BUY PORK RINDS" and place them on the counter for residents, intentionally knowing that this type of snack food is an affront against the majority of the growing Orthodox Jewish population.

9. Upon information and belief, there have been countless behind the door communications between Respondent's Mayor and Village Clerk/Treasurer relating to my personal, friendly, and open communications with village residents, which evidences the Mayor's interest and standard practice, to not equally and effectively service Orthodox Jewish residents.

10. Upon information and belief, it is common knowledge, amongst Village employees who have seen and heard the "Us vs. Them" operating model, that Respondent's Mayor demands this of us.

11. I believe Respondent terminated my employment because I provided competent, equal, and professional services to Orthodox Jewish investors, builders, and residents in contravention to Respondent's desired practice that I stop being too cooperative with certain Jewish residents of the village.

Based on the foregoing, I charge respondent with an unlawful discriminatory practice relating to employment because of creed, in violation of the New York State Human Rights Law (Executive Law, Article 15), Section 296.

I also charge the above-named respondent with violating Title VII of the Civil Rights Act of 1964, as amended (covers race, color, creed, national origin, sex relating to employment). I hereby authorize SDHR to accept this verified complaint on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) subject to the statutory limitations contained in the aforementioned law(s).

I have not commenced any other civil action, nor do I have an action pending before any administrative agency, under any state or local law, based upon this same unlawful discriminatory practice.

Noreen Shea  
Noreen Shea

STATE OF NEW YORK     )  
COUNTY OF ROCKLAND   ) SS:

Noreen Shea, being duly sworn, deposes and says: that he/she is the complainant herein; that he/she has read (or had read to him or her) the foregoing complaint and knows the content thereof; that the same is true of his/her own knowledge except as to the matters therein stated on information and belief; and that as to those matters, he/she believes the same to be true.

Noreen Shea  
Noreen Shea

Subscribed and sworn to  
before me this 3<sup>rd</sup> day  
of November, 2017

Alejandro G. Castillo  
Signature of Notary Public

